

## **Exhibit L**

**Shannon Reynolds**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF  
SHANNON REYNOLDS**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY                     )  
  : SS.:  
COUNTY OF MONMOUTH                 )

SHANNON REYNOLDS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 39 Circle Place, Lincroft, New Jersey 07738.

2. I am currently 29 years old, having been born on October 2, 1992.

3. I am the daughter of Mary Elizabeth Reynolds, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My mother passed away from peritoneal carcinoma on October 22, 2014, at the age of 51. It was determined by the World Trade Center Health Program that this illness was causally connected to her exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. I was only 22 years old when my mom died. She was a single mom, and she was everything to me. We would get up early so she could drop me off at school before sending me on the bus to go to the city. She took time off work when I was sick to take care of me. Some days, she would take me to work with her. She took me to all my after-school activities. I took dance classes since I was 3 years old, and she would watch every single class of mine until high

school. In third grade, I started cheerleading, and she would bring me to every practice. She'd just wait in the car for me, no matter how long the practice was. In between all of that, she made sure that I spent time with my cousins. We went ice skating, ate at Burger King, anything to make sure that we could spend time together.

6. On the morning of September 11, 2001, my mom was on her way into work. She was on a bus, about to enter the Brooklyn Battery Tunnel when the first plane hit the World Trade Center. We didn't have cellphones, but she panicked when she heard what had happened. She was finally able to get in touch with my aunt, who sent my Uncle Scott to pick me up from school. It was hours before my mom could get back home. Soon after, she started going into the city to work at the World Financial Center. She couldn't even take public transportation there. She was doing work for Merrill Lynch at the time, and they had provided a special shuttle that went straight to the World Financial Center. The fires were still burning at Ground Zero when my mom returned to work. She recovered hardware with her team for months. My mom always came home filthy, covered in dust from the debris. I mostly stayed with my grandma during that time.

7. In September 2013, I learned of my mom's cancer diagnosis. She was probably suffering for a long time before she was seen by a doctor—she was always hiding her pain. She had fallen in the shower because her stomach pain was so severe. She drove herself to the hospital and had to be taken into the hospital by a security guard in a wheelchair because she couldn't even park her car – that's how much pain she was in. They gave her all kinds of tests and scans. The doctors said she had a mass on her ovaries, and an oncologist confirmed it was cancer. I left to go get her prescriptions, and when I came back, she just stayed in her room for the rest of the day. Her diagnosis was jarring because it came out of nowhere. She didn't have any history of cancer before that. Her cancer was in a late stage and was advancing quickly.

8. She had a hysterectomy soon after her diagnosis. They cut her whole stomach open. She had so many staples in her body and so many scars. She was in excruciating pain once all the medications wore off after her surgery. I knew she had to be really miserable, because my mom had a high pain tolerance. She was crying out for help. She would call me in the middle of the night to say that she was in so much pain, and the doctors couldn't give her more medications. I'd leave my house and drive to the hospital to talk to the nurses on staff, just



to see if there was anything they could do. She went through chemotherapy and it made her so sick. She lost all her hair. She was always nauseous, she couldn't eat or drink. She was forced to drink protein shakes. I remember sitting through the PET scans with her where she couldn't move, and she would come out crying because she was so uncomfortable.

9. After the first round of chemotherapy, the doctors said she was okay. Her surgery margins were good. Even though they found colon cancer in her, they thought they got it. They told her, come back for a six-month scan. So, six months later, she went back to the doctor. And the cancer was everywhere. She couldn't feel it, but they could see it. It came back so fast. They did an additional surgery, which was terribly painful for her because they had to cut open her old scars for the new surgery. The second surgery was a waste, the doctors couldn't even do anything because her cancer had spread so much. They discharged her from the hospital and told us she had two weeks to live.

10. After I turned eighteen, my mom didn't receive Social Security benefits for me anymore. That impacted us financially. At the time my mom got sick, I was getting my real estate license and working part time doing whatever I could. When she got sick, I stayed with her all these nights in the hospital. I would go to work from the hospital, go home to shower, then right back to the hospital. I would barely even sleep. Any money I made was spent on my mom's hospital bills, or to pay for gas to bring her to doctor's appointments. I put my life on hold while we all tried to make sure she was okay. Everything was at a standstill. The only thing that mattered in my life was taking care of her. I was only 22 years old when she died. I was forced to grow up fast. Most kids don't even graduate college by then.

11. My mom was always the funniest person in the room. She always had a smile on her face and she made the best of any situation. From the time of her diagnosis until her death, it was like something had gone out of her. She tried to make the best of family holidays but it wasn't the same. When she realized that she wasn't going to make it, she tried so hard to figure out how to take care of me when she wasn't there. Trying to leave me instructions, passwords to different accounts. She tried to get everything in order just in case, even when she was too weak to move. She was so depressed, so distraught. She was bedridden. She was so scared. I don't

know what else to say—nothing will ever be enough. My mom is gone, and nothing can make up for that.

Shannon Reynolds  
SHANNON REYNOLDS

Sworn to before me this  
9 day of April, 2022

[Signature]  
Notary Public



**Suzanne Reynolds**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF**  
**SUZANNE REYNOLDS**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF RICHMOND    )

SUZANNE REYNOLDS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 72 Mobile Avenue, Staten Island, NY 10306.

2. I am currently 91 years old, having been born on August 22, 1930.

3. I am the mother of Mary Elizabeth Reynolds, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My daughter passed away from peritoneal carcinoma on October 22, 2014. She was only 51 years old. It was determined by the World Trade Center Health Program that this illness was causally connected to her exposure to toxins resulting from the 9/11 terrorist attacks.

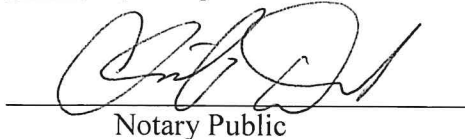
5. Mary always helped me and cared for me as I got older. In return, I looked after her daughter Shannon while she was working. Mary was a single mom, and I wanted to make sure that Shannon always had someone looking after her. Mary was a strong, intelligent, and independent woman. She worked hard, put herself through college, and then worked for Merrill Lynch. She was able to support herself and make a good life for herself and her daughter. She was a wonderful mother, sister, and daughter.

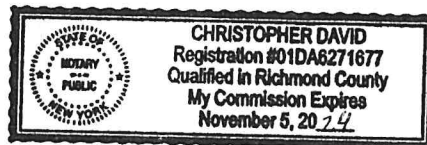
6. I knew that Mary was on her way to the city on the morning of September 11, 2001. She was taking the bus to work, and the bus was stopped just before the Brooklyn Battery Tunnel. I didn't know that at the time, however, as I couldn't get in contact with her. I was worried sick that Mary had been hurt or killed at the World Trade Center. My other daughter, Suzanne, soon called me to tell me that Mary was safe and wasn't in the World Trade Center. Mary returned to lower Manhattan a few weeks after the attacks. Merrill Lynch, Mary's employer, wanted all the computers and hardware that were salvageable to be taken out of the building. Mary worked in technology for Merrill Lynch, so she had to go search through the office at the World Financial Center to get any salvageable computer parts out of there. She was working a lot of overtime. I looked after Shannon during that time.

7. Mary called me first when she was diagnosed with cancer. That was in September 2013. I was heartbroken. The news of Mary's cancer sent me into depression. I have been taking anti-depressants ever since. In October 2013, the doctors told Mary she would need a full hysterectomy. She went in for the surgery, and the doctors told her they had removed the tumor. Then she went through chemotherapy, and she was good for about a year, maybe less. Her cancer returned after a year. She had terrible, terrible pains when her cancer came back. From then, she had two weeks to live. The loss of my daughter was devastating to me. She was so strong, but she was in so much pain. No parent should ever have to see their child go through that, let alone bury a child. My daughter should still be here, happy and healthy, enjoying her life with her daughter, but all of that was taken away from her because of 9/11.

  
SUZANNE REYNOLDS

Sworn to before me this  
9 day of April, 2022

  
Notary Public



**Angel Rivera**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF MELINDA  
RIVERA on behalf of  
ANGEL RIVERA**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF BRONX     )

MELINDA RIVERA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3030 Middletown Road, #2E, Bronx, New York 10461.

2. I am the sister of Liana Rivera, upon whose death my claim is based.

3. My dad, Angel Rivera, was a plaintiff in the within action, was over 18 years of age, and resided at 3030 Middletown Road, #2E, Bronx, New York 10461.

4. Subsequent to the filing of this lawsuit, Angel passed away. I submit this affidavit on his behalf in connection with the pending motion for a default judgment and in support of his solatium claim.

5. Angel was the father of the decedent, Liana Rivera, who passed away from breast cancer on January 12, 2014. Liana's illness was medically determined by the World Trade Center Health Program to be causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

6. Angel and Liana were extremely close. Before she became ill, we, as a family, including my father, would eat dinner together, watch Spanish *novelas*, and go to Liana's son



Luis's baseball games. We would spend every weekend, Friday to Sunday, together. We would go on weekend trips and day trips with the kids, go to movies, go out to the mall, and go to church. We were always together and out and about on the weekends. We also took yearly vacations as a family. Liana would always be the pilot, driving us to our destination, and Angel would be the co-pilot.

7. On the morning of September 11<sup>th</sup>, 2001, my father saw the attacks on the World Trade Center on TV. Since it was close to where Liana worked, he was extremely worried. He tried to call her but was unable to reach her. He then called me frantic, wanting to know if I had heard from her. Liana had seen the second plane crash into the World Trade Center and called me to tell me something was wrong, so I told all of that to our father. He attempted to drive into the city, but unfortunately, all the entrances to the city were blocked, so he had to turn around and return home. I met up with Liana at my office on West 72<sup>nd</sup> Street late that evening. Angel was so relieved that she got to me safely. Once the No. 2 train was running again, Liana and I took the train and met our father at the Bronx station.

8. On 9/11, Liana worked for the law firm Gair, Gair, and Conason at 80 Pine Street in lower Manhattan. Within two weeks of the attacks, Liana returned to her office. She told all of us, including our father, that the area around the World Trade Center site smelled like dead bodies. As soon as she got off the train, she would smell that horrible odor. Liana always believed that, even though the officials told everyone the air was safe, it had to be harmful to breathe in those fumes all the time. Angel wanted her to leave her job and find a job in Midtown, away from Ground Zero.

9. When Liana was diagnosed with breast cancer in July 2011, she didn't tell our father at first. Liana knew that our father would not be able to handle the news. Liana told him that it was a non-cancerous tumor, but that the doctors were going to give her chemotherapy just in case. Angel was concerned, but he was okay. After the chemotherapy, Liana had a mastectomy and then radiation. Our father knew something wasn't right, and he was stressed because Liana's condition kept worsening. He constantly asked me if Liana was alright, and why she was always crying. Finally, when Liana was diagnosed with Stage IV metastatic breast cancer in 2013, we had to break the news to our father that she had cancer.

10. When Liana became sick, our father dropped everything he was doing to take her to all her appointments. She had an appointment nearly every day, whether it was chemotherapy, radiation, or radiology. When she went back to work and was still sick, he at times drove her to work or as close as possible. He also helped to get Liana's son to his part time job, school events, and out on the weekends. Everyone in the family did their share taking care of Liana and her needs.

11. Angel was in denial during the last year of Liana's illness. He believed that she was just depressed and that she needed to force herself out of bed to get better. At one point, they both had to be hospitalized – Liana, because her mastectomy band had popped, and Angel, because the stress forced him to need a cardiac catheter. Angel was in poor health, but we had to concentrate on Liana because her health was even worse. Angel and Liana were extremely close. She was his first child, so he wanted to care for her, even though she was 49 years old.

12. Angel did not take Liana's death easily. Twice, paramedics had to come to Liana's funeral to check in on him because of his heart. He insisted on sleeping in the living room after her death because he did not want to pass by Liana's empty room, which was right at the top of the stairs. About two months later, he finally went back upstairs, but decided to sleep in Liana's room instead. Emotionally, we knew that would not be good for him. It also made us worry that he might lose his balance and fall down the stairs. Unfortunately, my suspicion was right. He fell down the stairs in March 2014. Angel broke sixteen bones and fractured his skull in three places after the fall. Toward the end of his life, Angel would cry out for Liana and hallucinate, saying that he was seeing her everywhere.

13. Financially, Liana's death had an impact on our father as well. Liana supported Angel financially. We all shared the expenses of taking care of Liana when she became ill. We all had to move because we could not afford to pay rent or bills without Liana's contribution. When Angel fell in March 2014 and was in the hospital, our parents were evicted from the premises.

14. Angel was never the same after Liana's passing. For the first few months after her death, he would just sit on the sofa with his coat on. He did not talk much. When we would bring up Liana and talk about the good times, he would become emotional and uncomfortable.

His health took a turn for the worse after her death. It was very hard on him.



MELINDA RIVERA  
on behalf of ANGEL RIVERA

Sworn to before me this  
10<sup>th</sup> day of May, 2022

Kenneth Joelson  
Notary Public

KENNETH JOELSON  
Notary Public, State of New York  
No. 02104624342  
Qualified in New York County  
My Commission Expires March 30, 2026

**Melinda Rivera**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF  
MELINDA RIVERA**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF BRONX     )

MELINDA RIVERA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3030 Middletown Road, #2E, Bronx, New York 10461.

2. I am currently 51 years old, having been born on October 1, 1970.

3. I am the sister of Liana Rivera, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Liana died from breast cancer on January 12, 2014, at the age of 49. It was medically determined that her cancer was causally connected to her prolonged exposure to the toxic air resulting from the September 11, 2001 terrorist attack.

5. Liana and I lived in the same building. We did everything together. We raised our children together. We were together 24/7, we were like spouses. We would do trips together, take our kids to the mall, and would commute together to work.

6. Liana worked for law firm Gair, Gair, and Conason at 80 Pine Street in lower Manhattan at the time of the September 11, 2001 terrorist attacks. She went back to work but always felt that the air quality couldn't possibly be healthy because it always smelled like a



crematorium; like dead bodies.

7. In 2011, Liana told me she had a painful lump on her breast that she went to get biopsied. She was told it was cancer. After a mastectomy, reconstructive surgery, and all the complications that followed, she recovered, but she was constantly in pain. We didn't know for a long time that she had Stage IV breast cancer. At first, they told us it was Stage II or III. After her first round of treatment, she seemed to recover, but then the cancer came back after about one year.

8. It was hard on all of us. It was especially hard on Liana's son, Luis. Luis and my daughter were starting high school. We had always done everything together.

9. The time commitment was hard. Liana was home all the time when she got sick. She couldn't make it to work anymore. Liana's son Luis and my daughter Alicia went to Catholic school, and we had to take out loans to pay for their education. All my bills got put on hold, which impacted my credit report. Liana paid for most of everything, but even then, most of that money went to her medical expenses. It was a hard time emotionally and financially. It was also hard for our kids, because we went from an active family to staying at home, doing nothing.

10. We had to put Liana in a rehabilitation facility because Luis was so young, and we didn't want him to see his mother in so much pain. We also had to leave our young children alone at home to go to the hospital every day to visit Liana. She was in the hospital for months. It was really bad. She would cry all the time. She didn't want us to leave her at the hospital. Every day, I wake up thinking of her, and I go to sleep thinking of her. I miss her terribly.

  
MELINDA RIVERA

Sworn to before me this  
13<sup>th</sup> day of April, 2022

  
Notary Public

KENNETH JOHNSON  
Notary Public, State of New York  
No. 02104094042  
Qualified in New York County  
My Commission Expires March 30, 2026

**Ruth Rivera**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF  
RUTH RIVERA**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )

: SS.:

COUNTY OF BRONX )

RUTH RIVERA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3030 Middletown Road 2E Bronx, NY 10461.

2. I was born on February 17, 1945.

3. I am the mother of Liana Rivera, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My beautiful daughter died of breast cancer on January 12, 2014. She was only 49 years old. It was medically determined that Liana's illness was causally connected to her exposure to the toxins resulting from the September 11<sup>th</sup> terrorist attacks.

5. Liana and I did everything together, we would eat dinner together every night. We were a close family. Liana took care of us, my late husband and me. She was my oldest daughter, I babied her. My two girls, Liana and Melinda, were inseparable. They didn't even need friends, they had each other. Her son, Luis, too. Our family was inseparable. We had many good times and have many good memories.

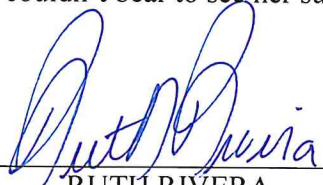
6. Liana called me when the Twin Towers fell on 9/11. She was working in a law firm in lower Manhattan, only a few short blocks from the Trade Center. After the attacks, she left work and walked uptown to my daughter Melinda's job. She needed her inhaler because she was asthmatic. She had to take off her shoes and walk in socks. She met up with Melinda at her office. They were both in shock that it was happening. We all were. I was extremely nervous until they both got home.

7. After a while, Liana did go back to work, because supposedly everything was okay. She went back to work normally, but she always expressed doubt that the air was fine.

8. When Liana was first diagnosed with breast cancer, my children didn't want to tell me. They told me that it wasn't cancer, that everything was okay. Even when she had chemotherapy, they were telling me it was precautionary and that everything was fine. They didn't want to give me that news.

9. Emotionally, I was devastated. I remember one day she went to work, and she was supposed to get there at 9:00 a.m. She called me about 11 a.m. and told me that she hadn't gotten to work yet—she was sitting on a bench, too out of breath to even walk. She was so tired. It was the little things like that that petrified me. She didn't even know why she was so sick.

10. As a family, we were extremely close. Liana once told me, "Mom, I hate to leave Melinda alone." Deep inside, she knew that she was going to die. She knew that her time was up. She didn't want to leave her sister and her son alone. And she was so focused on taking care of me and my husband. I told her one day after a doctor's visit, "It can't be that bad because they haven't told you how much time you have left." She said, "Mom, I haven't asked." And she started to cry. My heart broke for her, for us all. I was in complete denial, but she knew she was going to leave us. She was in so much pain at the end. I couldn't bear to see her suffering that way. We all feel her loss every day.

  
RUTH RIVERA

Sworn to before me this  
13th day of April, 2022

  
Notary Public

**Luis Torres**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

Plaintiffs,

**AFFIDAVIT OF  
LUIS TORRES**

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF CONNECTICUT )

: SS.:

COUNTY OF NEW HAVEN )

LUIS TORRES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 800 Country Club Road, Waterbury, CT 06708.

2. I am currently 24 years old, having been born on July 4, 1997.

3. I am the son of Liana Rivera, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My mother died from breast cancer on January 12, 2014, at the age of 49. It was medically determined that her cancer was causally connected to her prolonged exposure to the toxic air resulting from the September 11, 2001 terrorist attack.

5. I didn't have a father growing up, so my mother was everything to me—she was both mother and father. She was at every baseball game, parent-teacher meeting, Boy Scouts trip, school field trip, everything. We went out every weekend to the movies, mini-golf, bowling, anything I wanted. She did everything to help me pass school, even when I was acting out. She made study guides for me, practice tests, tutoring, and she sent me to Catholic school

my whole life. She was my best friend.

6. I was very young on September 11, 2001. I only know what happened from secondhand accounts. I know she worked within a few blocks of the World Trade Center. That day, after the attacks, she walked more than 30 blocks to get to my aunt's office in midtown Manhattan to go home with her. My mom went back to work when lower Manhattan opened and continued to work there. She always said she didn't think the air quality could be safe down there.

7. My mom noticed that she had a lump on her breast when we went on a family trip to Florida. Two weeks later, she found out that it was breast cancer and she told me about it. She always said it was in God's hands, and that everything would be okay.

8. Our lives became harder once my mom got sick. My mom couldn't afford to live by herself, so we had to move upstairs to live in my aunt's apartment. There were six of us in one apartment – me, my mom, my Aunt Melinda, my cousin Alicia, and my grandparents. It was difficult to be a 15-year-old boy sharing a bed with your mother. Towards the end, before she was admitted to the hospital, I didn't sleep at all. I stopped going to class around September or October 2013. I just couldn't make it to class...I would get dropped off at school and come right home, and I would see my mother coming back from the bus stop because she didn't want to go to work. We would just watch movies together at home. I wish we could do that again.

9. As she became more ill, I could see she was in so much pain, but she always tried to shield me from it. I was always afraid that each day would be her last. I couldn't bear that thought. I am just so grateful that my family helped me through it.

10. When my mother passed, I didn't go to school for four months. Even though I consider my Aunt Melinda to be like a mother to me, it's not the same. I have to say I am grateful for my family, my aunt Melinda, and my grandparents. I was glad that they were there to take care of me after my mother died. If they hadn't been there for me, I'd probably be in the foster care system. I was sad that my mother never got to see my college graduation. She would



have been so happy and proud. Nobody thought I would be able to graduate from college. Now I'm in the second year of my Master's program. I miss my mom every day.

*Luis Torres*

LUIS TORRES

Sworn to before me this  
13<sup>th</sup> day of April, 2022

*Kenneth Johnson*  
Notary Public

KENNETH JOHNSON  
Notary Public, State of New York  
No. 02304624342  
Qualified in New York County  
My Commission Expires March 30, 2026

**Robin Rossi**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF ROBIN ROSSI**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NORTH CAROLINA    )  
                                      : SS.:  
COUNTY OF ROWAN            )

ROBIN ROSSI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1790 Cranwell Drive, Mount Ulla, North Carolina 28125.

2. I am currently 60 years old, having been born on May 26, 1961.

3. I am the son of Robert Carlo Rossi, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from prostate cancer on April 13, 2016. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father and I were very close. We lived together up until the time of his death. I spent my whole life with him. We worked together, had similar interests, and did many things together. We were both automobile enthusiasts, and often went to car shows and fixed cars together. We also worked together building houses. My father was my best friend.

6. My father wasn't in lower Manhattan on 9/11, but he responded to the World Trade Center site soon after. He was a retired FDNY firefighter, so he could get closer to the

rubble at Ground Zero than other civilians could. He would go down there with a friend, another former FDNY firefighter, who also ended up passing away due to his exposure. They would bring cases of bottled water for the firemen to flush out their eyes. I know that my father responded to the World Trade Center site at least 5-10 times. He didn't talk about it. Many of them didn't talk about it because what they saw was so traumatizing.

7. My father started having problems urinating in approximately 2012. I think he knew he was getting sick before he told us, but he kept it to himself. He was afraid of illness and didn't want to go to the doctor. However, I started to notice changes. He and my mother used to like to go to Atlantic City in New Jersey. They would take the long drive from North Carolina to New Jersey. They stopped going on these trips because my father was having continence issues and couldn't do the drive anymore. It was a while still until he actually got the diagnosis and was treated. He had his first biopsy in September 2015. That was the beginning of the end. It is difficult to tell someone what to do, and he always resisted going to the doctor. He was of a different generation. He didn't want to think about his health problems. He was a very strong-willed person.

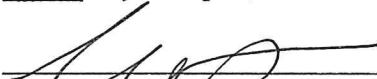
8. His condition started to rapidly decline in 2015. I immediately noticed that he was becoming weaker. My mother was devastated by my father's prostate cancer diagnosis. She was elderly as well, so she had a hard time taking care of him. I took over his care for my mother's sake. It was convenient for me to be his full-time caretaker since we lived together. I took him to the doctor's office, and I took care of him at home as his health failed. I cleaned him, bathed him, and fed him. However, I still wanted my dad to have self-respect. I tried to put on a strong appearance for both my parents, but I was deeply hurting.

9. I had to take time off from work to take care of my father. I was self-employed, so taking time off was a serious financial strain for me. But I had to take on the caretaker mentality. I was with him all the time, even at the hospital. Always wanting my father to be well taken care of, I felt like I would often be doing the nurse's job because they were so busy. I didn't really want strangers taking care of him. It was like on-the-job training, since no one taught me how to take care of him. In the end, I only hope I eased his pain, even if it was just for a little while.

10. It was obvious to us that my dad was in severe pain. He deteriorated from a strong individual to someone who couldn't walk, couldn't speak, and had no control of his bodily functions. His pain was immense. It was devastating to see. It still haunts me to this day. I remember his screams of agony during cancer treatment. I feel responsible for it, because I was the one who took him to the hospital. He was in excruciating pain, even with strong sedatives being administered. Towards the end, he became quiet. I don't know if it was the illness or just accepting his fate, but I just couldn't get any response from him anymore. The doctors told me that the cancer may have spread to his brain. It seemed like he totally lost his will to live and became despondent. He passed away not too long after the last treatment. I was there every day watching him, it's pretty harrowing and vivid in my mind. He didn't deserve the cards he was dealt. He was just trying to do right by others after the terrorist attacks, and he paid the ultimate price with his life.

  
\_\_\_\_\_  
ROBIN ROSSI

Sworn to before me this  
5<sup>th</sup> day of April, 2022

  
\_\_\_\_\_  
Notary Public

**RISA L WITT**  
Notary Public - State of New York  
No. 01WI6008601  
Qualified in Suffolk County  
My Commission Expires June 13, 2022

**Denise Schmittau**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF**  
**DENISE SCHMITTAU**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF RICHMOND    )

DENISE SCHMITTAU, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 29 Truman Street, Staten Island, New York 10307.

2. I am currently 54 years old, having been born on March 9, 1968.

3. I am the wife of John Schmittau, upon whom my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from pancreatic cancer on November 28, 2012, at the young age of 45. It was medically determined that his cancer was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. John and I had a great life. We were always going out, hanging out together with family, going on vacations, and spending time with our kids. He loved to played softball with our girls. We spent a lot of time together. We were truly a happily married couple.

6. John was a sanitation supervisor for the NYC Department of Sanitation. He wasn't at the World Trade Center site on 9/11, but went there soon afterwards. He was constantly working in downtown Manhattan. Afterwards, he supervised his employees when

they brought debris over to the Staten Island landfill.

7. My husband was a very healthy, 44-year-old man at the time that he got sick. He was in the best shape of his life. One day, after having played softball, he came home and complained of a pain in his side. In the weeks following, the pain got worse and worse. We took many trips to the hospital and saw many doctors, but no one knew what was wrong with him. We underwent a lot of testing. Finally, about four months into his complaints about pain in his side, we took him to a doctor in Manhattan, who thought he knew what was wrong with him. The doctor thought he had an issue with his pancreas duct, and suggested a simple surgical procedure of placing stents into his pancreatic ducts. The “simple” surgery, which was only supposed to last about 90 minutes, took almost 4 hours. After the surgery, the doctor came out and told me that he believed John had pancreatic cancer. I was totally shocked. I was not expecting that at all.

8. They took samples for biopsy right away. It was all very confusing at first. The first biopsy said he didn’t have cancer, but the blood work said he did. Then, they took another sample for a biopsy. When the next set of biopsies came back, they confirmed that John had pancreatic cancer. I remember feeling so devastated when he woke up from the surgery and the doctor had to tell him he had pancreatic cancer.

9. Emotionally, I was a tremendous mess. I had three kids at home, and my husband didn’t want them to know that he had cancer. For a few months, we tried to hide it as much as we could. I was under enormous stress dealing with my husband and his emotions, and trying to hide it in front of my children. I didn’t want their lives to be affected by it. I took them to cheerleading practice, gymnastics, and softball, like we always did. I tried to live every day as normally as possible. It was extremely hard on me.

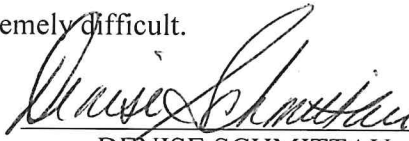
10. John had surgery two days after Christmas in 2011. The kids knew that he was sick, but they didn’t know the extent of his illness. He started his first round of chemotherapy in February 2012. He had to wait until April 2012 to get a CAT scan to know if the chemotherapy had worked. When he went for the CAT scan, we found out that the cancer had spread throughout his entire pancreas and into his liver. He was given a terminal diagnosis, with only six to twelve months to live. It was very, very hard to hear that. It was heart-wrenching to have to look my children in their eyes and tell them that, especially when we tried to shield so much

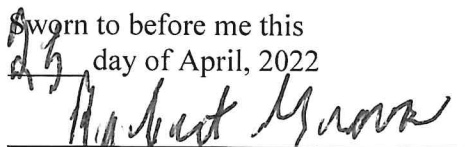
of his illness from them.

11. I was John's full-time caregiver. He tried to do as much as he could on his own, but each day he became more and more weak. He could barely walk and could not go to the bathroom on his own. I used to have to carry him from the bedroom to the bathroom. He couldn't stand in the shower. He was too weak to stand for any long period of time. He had lost so much weight. He used to crawl up the stairs to lay in the bathtub because his body hurt so much.

12. I couldn't sleep. I was worrying about him all the time. I was always listening to him to make sure he was still breathing. He slept on the couch, and I bought a baby monitor to keep an eye on him. To this day, I still have insomnia.

13. When he passed away, we didn't have much money. I had to borrow money from people to help pay off my mortgage. The funeral parlor was gracious and allowed me to wait to pay. With the cemetery, I had to pay right away. Whatever money I had in the bank, I used to pay the cemetery. Financially, it was very tough. I was working as much as I could to put food on the table and make sure that the electric bills and heating bills were paid. I didn't want to put that burden on my kids. I was falling apart. My husband was a young man, he was only 45 when he passed away. He suffered so needlessly. We could have continued to be happy and have a good life. I feel robbed of that. And it hurts that he's also missing out on so many milestones in our daughters' lives. Life without him as been extremely difficult.

  
DENISE SCHMITTAU

Sworn to before me this  
23 day of April, 2022  
  
Notary Public

**ROBERT GROVA**  
Notary Public - State of New York  
No. 01GR6359771  
Qualified in Richmond County  
My Commission Expires June 5, 2025



**Kayla Schmittau**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF  
KAYLA SCHMITTAU**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF ILLINOIS        )  
                                  : SS.:  
COUNTY OF COOK        )

KAYLA SCHMITTAU, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1811 West Iowa Street, Apt 1, Chicago, Illinois 60622.

2. I am currently 27 years old, having been born on February 6, 1995.

3. I am the daughter of John Schmittau, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on November 28, 2012, when I was just 17-years old. It has been medically determined that his illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was a great parent. He was very involved in our lives. He used to coach our softball teams, hosted movie nights and video game nights, and played with us whenever he could. He was an integral part of our lives. We had dinner every night together as a family when my sisters and I were younger.

6. I was only 6-years old on 9/11. I had no awareness of what my dad was doing at the time, but my mom later told me how he was involved in the clean-up efforts at the World


Trade Center site. I knew he worked for the NYC Department of Sanitation.

7. My parents did a really good job of worrying us as little as possible during my dad's illness. We found out slowly, in bits and pieces. We knew something was going on, but didn't know the severity or the extent of what was going on. I remember when my parents told us that my dad had cancer. I was a junior in high school. I felt so helpless and scared. I remember praying for him multiple times per day. It was hard balancing high school with my dad's illness. I had to keep up with a scholarship, apply to college, and focus on my grades. My parents did a great job of trying to shield me and not let it affect me. But I was thinking about his illness all day, every day. During my dad's illness, my mom was his primary caregiver. I would help by coordinating his medications and keeping a schedule so that he could take his pills on time.

8. My dad passed away when I was 17, so he missed out on everything that happened in my adult life. He didn't see me off to college, didn't get to be at my college graduation, and didn't get to see me go through medical school. I know he looks down and is so proud of me. It just hurts all the time that he's not here. When my sisters and I get married and have kids one day, he won't be there for that either. Everything that lies in front of us, my father won't be there for. I feel the worst for him. Passing at such a young age, he didn't get to do everything that he wanted to do. I feel really badly for my mom as well, because my parents were the perfect couple and they were meant for each other. They lost out on a life together.

  
KAYLA SCHMITTAU

Sworn to before me this  
11 day of April, 2022

  
Notary Public

"OFFICIAL SEAL"  
DWAYNE E HARRIS  
Notary Public, State of Illinois  
My Commission Expires 8/17/2022